

Lawrence, John

From: Azman, Darren <Dazman@mwe.com>
Sent: Monday, April 26, 2021 7:28 PM
To: Lawrence, John; Gibbs, Charles; Yang, Darren; Adams, Blaine
Cc: Spigel, Robin; Rubenstein, Jonathan; Kazlow, Jordan
Subject: Re: Griddy - stipulation re abatement of motion to quash; protective order

[EXTERNAL EMAIL]

Yes please. Thank you John.

Darren Azman
Partner
McDermott Will & Emery LLP
Tel: (212) 547-5615
Mobile: (410) 409-7591

From: Lawrence, John <John.Lawrence@bakerbotts.com>
Sent: Monday, April 26, 2021 8:26:06 PM
To: Azman, Darren <Dazman@mwe.com>; Gibbs, Charles <Crgibbs@mwe.com>; Yang, Darren <Ddyang@mwe.com>; Adams, Blaine <Badams@mwe.com>
Cc: Spigel, Robin <robin.spigel@bakerbotts.com>; Rubenstein, Jonathan <Jonathan.Rubenstein@BakerBotts.com>; Kazlow, Jordan <jordan.kazlow@BakerBotts.com>
Subject: RE: Griddy - stipulation re abatement of motion to quash; protective order

Thanks Darren, we will check and get back to you. Are those also the entities for which you still need identification of officers and directors?

John

John B. Lawrence | Baker Botts L.L.P. ■ | 214.953.6873 | 214.883.7448 cell

From: Azman, Darren <Dazman@mwe.com>
Sent: Monday, April 26, 2021 6:31 PM
To: Lawrence, John <John.Lawrence@bakerbotts.com>; Gibbs, Charles <Crgibbs@mwe.com>; Yang, Darren <Ddyang@mwe.com>; Adams, Blaine <Badams@mwe.com>
Cc: Spigel, Robin <robin.spigel@bakerbotts.com>; Rubenstein, Jonathan <Jonathan.Rubenstein@BakerBotts.com>; Kazlow, Jordan <jordan.kazlow@BakerBotts.com>
Subject: RE: Griddy - stipulation re abatement of motion to quash; protective order

[EXTERNAL EMAIL]

John,

At this time, we would like contact information for Griddy Technologies and Griddy Pro. We understand your concerns regarding the scope of Requests 3 and 4 and will come back to you shortly with a proposal to narrow those

requests. Our position regarding production from and related to the non-debtor affiliates remains unchanged from what we laid out in our objection.

Best,
Darren

DARREN AZMAN
Partner

McDermott Will & Emery LLP 340 Madison Avenue, New York, NY 10173-1922

Tel +1 212 547 5615 **Mobile** +1 410 409 7591 **Email** dazman@mwe.com

Biography | **Website** | **vCard** | **Twitter** | **LinkedIn**

From: Lawrence, John <John.Lawrence@bakerbotts.com>

Sent: Monday, April 26, 2021 3:39 PM

To: Azman, Darren <Dazman@mwe.com>; Gibbs, Charles <Crgibbs@mwe.com>; Yang, Darren <Ddyang@mwe.com>; Adams, Blaine <Badams@mwe.com>

Cc: Spigel, Robin <robin.spigel@bakerbotts.com>; Rubenstein, Jonathan <Jonathan.Rubenstein@BakerBotts.com>; Kazlow, Jordan <jordan.kazlow@BakerBotts.com>

Subject: RE: Griddy - stipulation re abatement of motion to quash; protective order

Darren,

I've now read the Committee's Objection. We were unaware the Committee had any complaint about the Debtor's objections to Request Nos. 3 and 4 from the Second Request, as you did not mention those when we conferred on our objections on April 16. We remain committed to getting the Committee what it needs to do its job. While Request Nos. 3 and 4 are impossibly broad as written – as stated in our objection, nearly every Debtor document and communication from the start of Winter Storm Uri through the Petition Date in some way is “concerning Winter Storm Uri” – if you have specific types of documents you'd like see beyond those the Debtor has already agreed to produce in response to the First Request, we're certainly willing to entertain that. Based on your review of documents to date, are there types of documents you think you're still looking for?

Similarly, following your call with Mr. Fallquist on Thursday morning, and your and my follow-up call Thursday afternoon, I was not aware that you still wanted counsel/contact information for the other Non-Debtor Affiliates. I assume that now that you have a better understanding of the Non-Debtor Affiliates you no longer intend to serve discovery on all of them. Let us know which you need, and we'll try to coordinate getting you that information.

Thanks,
John

John B. Lawrence | Baker Botts L.L.P. ■ | 214.953.6873 | 214.883.7448 cell

From: Azman, Darren <Dazman@mwe.com>

Sent: Saturday, April 24, 2021 10:47 AM

To: Lawrence, John <John.Lawrence@bakerbotts.com>; Gibbs, Charles <Crgibbs@mwe.com>; Yang, Darren <Ddyang@mwe.com>; Adams, Blaine <Badams@mwe.com>

Cc: Spigel, Robin <robin.spigel@bakerbotts.com>; Rubenstein, Jonathan <Jonathan.Rubenstein@BakerBotts.com>; Kazlow, Jordan <jordan.kazlow@BakerBotts.com>

Subject: Re: Griddy - stipulation re abatement of motion to quash; protective order

[EXTERNAL EMAIL]

Thanks John. We will get our objection on file by Sunday night. Will you get a notice of hearing on file to tee it up for Thursday?

Darren Azman
Partner
McDermott Will & Emery LLP
Tel: (212) 547-5615
Mobile: (410) 409-7591

From: Lawrence, John <John.Lawrence@bakerbotts.com>

Sent: Friday, April 23, 2021 8:16:37 PM

To: Azman, Darren <Dazman@mwe.com>; Gibbs, Charles <Crgibbs@mwe.com>; Yang, Darren <Ddyang@mwe.com>; Adams, Blaine <Badams@mwe.com>

Cc: Spigel, Robin <robin.spigel@bakerbotts.com>; Rubenstein, Jonathan <Jonathan.Rubenstein@BakerBotts.com>; Kazlow, Jordan <jordan.kazlow@BakerBotts.com>

Subject: RE: Griddy - stipulation re abatement of motion to quash; protective order

Darren,

That's disappointing, and I think counter-productive. When you and I spoke yesterday, we agreed it made sense to file this abatement, and to tell the Court what I included in the draft I sent this morning; namely, that the parties have been working cooperatively and in good faith to resolve the issues raised in the motion to quash, and that the parties believed they would be able to resolve those issues without Court intervention. If those words were true yesterday, I'm not sure what changed. They remain true for the Debtor.

While it is our belief that this only serves to harm our mutual goal moving forward efficiently, and will result in further needless waste of limited estate resources, if the Committee would like to have the motion heard at next week's hearing we will do that. On our call you mentioned a potential response deadline of Sunday night, which we can agree to.

Regards,
John

John B. Lawrence | Baker Botts L.L.P. ■ | 214.953.6873 | 214.883.7448 cell

From: Azman, Darren <Dazman@mwe.com>

Sent: Friday, April 23, 2021 5:04 PM

To: Lawrence, John <John.Lawrence@bakerbotts.com>; Gibbs, Charles <Crgibbs@mwe.com>; Yang, Darren <Ddyang@mwe.com>; Adams, Blaine <Badams@mwe.com>

Cc: Spigel, Robin <robin.spigel@bakerbotts.com>; Rubenstein, Jonathan <Jonathan.Rubenstein@BakerBotts.com>; Kazlow, Jordan <jordan.kazlow@BakerBotts.com>

Subject: RE: Griddy - stipulation re abatement of motion to quash; protective order

[EXTERNAL EMAIL]

Thanks, John. As we just discussed, the Committee would like to have the motion to quash heard at the hearing next week consistent with the Debtor's interest in moving this case forward as quickly as possible. Please let us know if that's acceptable and we can agree on a scheduling timeline for our objection.

DARREN AZMAN

Partner

McDermott Will & Emery LLP 340 Madison Avenue, New York, NY 10173-1922

Tel +1 212 547 5615 **Mobile** +1 410 409 7591 **Email** dazman@mwe.com

Biography | **Website** | **vCard** | **Twitter** | **LinkedIn**

From: Lawrence, John <John.Lawrence@bakerbotts.com>

Sent: Friday, April 23, 2021 1:29 PM

To: Azman, Darren <Dazman@mwe.com>; Gibbs, Charles <Crgibbs@mwe.com>; Yang, Darren <Ddyang@mwe.com>; Adams, Blaine <Badams@mwe.com>

Cc: Spigel, Robin <robin.spigel@bakerbotts.com>; Rubenstein, Jonathan <Jonathan.Rubenstein@BakerBotts.com>; Kazlow, Jordan <jordan.kazlow@BakerBotts.com>

Subject: Griddy - stipulation re abatement of motion to quash; protective order

[External Email]

Darren,

As discussed, I'm attaching drafts of a stipulation abating the motion to quash, and a stipulated protective order. Please let us know any comments you may have.

Thanks,
John

John B. Lawrence | Baker Botts L.L.P. ■ | 214.953.6873 | 214.883.7448 cellD

Confidentiality Notice:

The information contained in this email and any attachments is intended only for the recipient[s] listed above and may be privileged and confidential. Any dissemination, copying, or use of or reliance upon such information by or to anyone other than the recipient[s] listed above is prohibited. If you have received this message in error, please notify the sender immediately at the email address above and destroy any and all copies of this message.

This message is a PRIVATE communication. This message and all attachments are a private communication sent by a law firm and may be confidential or protected by privilege. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of the information contained in or attached to this message is strictly prohibited. Please notify the sender of the delivery error by replying to this message, and then delete it from your system. Our [Privacy Policy](#) explains how we may use your personal information or data and any personal information or data provided or made available to us. Thank you.

Please visit <http://www.mwe.com/> for more information about our Firm.